PLA

*TOKTATED STATES DESTITED COURT *

FOR THE DESTITECT OF DELAWARE *

CTITON NO. 105-CV-739-3LR

CURTES M. COLLERS

WARDEN ROCK KZARney RT. AL 火

JAMES CHANDIER "- NEXT - PASE



DEFENDANTS: ANSWER TO THE COMPLAINT

ON : PAGE # 24 SCATENCE NO. 11 OF THE COMPLAINT" That began with, so PLAINTIFF Obzyed" ARE DONIED" MY ANSWER IS THIS how That COULD BE DENTED "WHEN THE PININTIFF" got up AND THROW AWAY THE FOOD AT THE OFFICER REQUEST. OK NOW SETTENCE NO. 12 THE ALLEGATIONS OF THE COMPLAINT That began woth, Then, Plazntiff, Approaches ARE, Denied" how Could That be when STATE DEFENDANTS "ANSWER TO THE AMENDED COMPRADIT OUT PAGE Z SENTENCE NO. 5 STARE DEFENDANTS So ADMit That The Plaintiff began TAIKing TO THE SERGEANT AFTER he was opeven a Direct order to Dump his "TRAY THE DEPOSETTEDH OF SERGEANT JAMES CHANDLER WAS hELD ON Movember 2" THET' hAD TEXT WRITHEN QUESTION" FOR THE SOT" JAMES CHAMPIER TO ANSWER! THE PLAINTIFF NUMBER 3 QUESTION TO SOT" CHANDIER WAS IS IT TRUE WHEN PLAINTIFF COLMENS CAME TO YOU ABOUT A UNPROFESSIONAL OFFICER BEREZANSKY BEERING OUT OF CONTROL "HIS ANSWER TO HUMBER 3 WAS NO! THE SOTICHANDIER TOID THE "JUDGE A"LIE" because when you go BACK TO THE STATE DEFENDANTS 'ANSWER TO THE AMENDED COMPLAINT ONT PAGE 2 SENTENCE NO. 5 SHATE DEFENDANTS

ADMEST That the Plaintiff began Talking TO THE SCEDANT

*TITATED" STATES"DESTFECT" COURT"

* FOR THE DESTRACT "OF" DELAWARES

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& EXVELACTION NO. 105-CV-739-5.L.R

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WARDEN

RECK KEARNEY

CHRITIS M. COLLERS

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PRESON REFUSES TO TAKE A LIE DETECTOR"TEST!

BACK TO THE DEFENDANTS ANSWER TO THE COMPLAINT SCATEGE NO. 13 THE ALLESATIONS OF SENTENCE HUMBER 13#13 OF THE COMPLAINT That begin with so seeseast chandler ARE DENIED IS ALSO A MITE When you go back TO THE AMENDED COMPLAINT ON PASE & BENTENCE Number 5# STATE DEFENDANTS ADMITS That the PlainLIFF WAS TALKING TO THE Sot Chandler THE DEFENDANTS CONTRICDICKED Themsleves ok now back TO THE DEFENDANTS ANSWER TO THE complaint Sentence No. 14 The Allegarion Number 14# complaint That begin with "As PlaintiFF WAS SPEAKing ARR" Denied That Is Another Lie because when you GO BACK TO DEPENDANTS ANSWER TO THE AMENDED COMPLAINT Again on Page 2" sentence Number 5 Again were State DEFENDANTS ADMITS, OK BACK TO THE DEPOSITATIONS OF BRADIZY BEREZANSKY WITH THE TEN WRITTEN QUESTRONS ANSWER NUMBER 4 WAS YES BEREZANSKY has a history of abusein Inmates At S.C.I. PRISON AND he been SUXERD beFORE" AND TO Answer Number 5# EN THE TEN WEETHEN QUESTION YES THE TRUE THAT 82 PERCENT OF BEREZANSKY DISCIPLINARY REPORTS FILED ON INMATES ARE Black AT MHC S.C. Z. PRISON NEXT PASE



FOR THE DESTFECT OF DELAWARE

COURL NO. 105-C-V- 739-SLR

WHEN THE COURTS LOOK AT OFFICER BEREZANSKY hostory Reports "They warn see That he has a MENTAL PROBLEM They WILL ALSO SEE ALL OF THE Complaints That he has OF Them From Inmortes COMPLARING TO THE PRASON About BEREZANSKY CRAZZY ACTION TOWARD IN MATES being Abuse AND CAPTURED PEPPER SPRAYED TO THE FULLET "AND have All KiNDS OF RACEAL JOKES About black people" KETUSEAL OF MEDERAL NURSE HELEN A. Whitley SAID IN ONE OF her Reports' That I' hAD EXPAYS TAKEERS 8-8-05# TWO DAYS AFTER THE INCAPENT whach Is a big lie" my EXRAYS WAS TAKEIN ON DE 8-17-05 AND I WAS TOLD ON 9-22-05 That I hAD FRACTURES Ribs" AND That was THE Day That It have been REALLY TREATED FOR MY ENJURSES"ON 9'22-05 AND THAT WAS THE MERY FIRST MIME & SAW DOCTOR BURNS" I AISO MAYBE hAD About 18 Sack CALL SLIP An Compresing About Some Strong MEDICIATION FOR MY FRACTURES RIBS ENJURGES THAT I REGIZEDED FROM CORRECTIONAL OFFICER BRUTALITY"ON THE PLANTIFF

DELAWARE CORRECTIONAL CENTER

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DESTRICT COTTON 844.

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